

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**WILLIS BREWER, individually and  
on behalf of all persons similarly  
situated,**

**Plaintiff,**

**v.**

**HOMELAND VINYL PRODUCTS,  
INC.,**

**Defendant.**

**No. 1:17-cv-04290-NLH-KMW**

**(Document Filed Electronically)**

**PLAINTIFF'S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT**

Plaintiff Willis Brewer, through his undersigned counsel, respectfully moves this Court for an Order:

1. Granting preliminary approval of the Parties' Settlement Agreement, a true and correct copy of which is attached as Exhibit 1 to this Motion;
2. For settlement purposes, preliminarily certifying the New Jersey state law claims as a Fed. R. Civ. P. 23 class and the Fair Labor Standards Act claims as a collective on behalf of the Settlement Class;
3. Preliminarily approving Plaintiff Willis Brewer as the Representative of the Settlement Class;
4. Preliminarily approving Berger Montague PC and Schneider Wallace

Cottrell Konecky Wotkyns LLP as Class Counsel for the Settlement Class;

5. Preliminarily approving Angeion Group as Settlement Administrator and preliminarily approving the costs of claims administration;

6. Approving the proposed schedule and procedure for completing the final approval process as set forth in the Parties' Settlement Agreement.

This Motion is based on the accompanying Memorandum of Law, the Declarations of Sarah Schalman-Bergen and Carolyn Hunt Cottrell in Support of the Plaintiff's Unopposed Motion for Preliminary Approval of the Settlement Agreement, the attached Exhibits, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendant does not oppose this Motion.

A proposed Order is submitted for the Court's consideration.

Dated: March 29, 2019

Respectfully submitted,

**BERGER MONTAGUE PC**

s/ Camille Fundora Rodriguez  
Camille Fundora Rodriguez (NJ  
017642011)  
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*Attorneys for Plaintiff and the Settlement  
Class*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through the Court's ECF system this 29<sup>th</sup> day of March 2019.

s/ Camille Fundora Rodriguez  
Camille Fundora Rodriguez